

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

SONYA ALICIA MAYES, JA'QUEZ
PASCHAL, JA'VONTAE COLEMAN, and
ZYRESE MAYES,

Plaintiffs,

v.

AUGUSTA-RICHMOND COUNTY
GOVERNMENT, RICHMOND COUNTY
SHERIFF'S OFFICE, SHERIFF RICHARD
ROUNDTREE, individually and in his
official capacity, and JOHN DOES,

Defendants.

CIVIL ACTION NO.: _____

NOTICE OF REMOVAL

COME NOW Defendants and file this Notice of Removal pursuant to 28 U.S.C. § 1441 and 1446, showing the Court the following:

1. Plaintiffs filed a Complaint in the Superior Court of Richmond County on November 29, 2022, styled Sonya Alicia Mayes, Ja'quez Paschal, Ja'vontae Coleman, and Zyrese Mayes v. Augusta-Richmond County Government, Richmond County Sheriff's Office, Sheriff Richard Roundtree, Individually and In His Official Capacity, and John Does, Civil Action No. 2022-RCCV-00536, a copy of which is attached as Exhibit A.
2. Defendant Augusta, Georgia and Defendants Sheriff Richard Roundtree, the Richmond County Sheriff's Office and John Does were served with a copy of the Complaint on December 6, 2022 and December 5, 2022, respectively, and copies of the entries of service are attached as Exhibit B.

3. This Notice of Removal is being filed within 30 days of service on Defendants pursuant to 28 U.S.C. § 1446(b).
4. Plaintiff brought this action pursuant to 42 U.S.C. § 1983 asserting claims of unreasonable search and seizure, excessive force, and unlawful arrest in violation of the Fourth and Fourteenth amendments.
5. Plaintiff also alleges state law claims of negligence.
6. This action presents a federal question over which the District Court has original subject matter jurisdiction pursuant to 28 U.S.C. § 1331; it also presents a claim over which the District Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367.
7. Pursuant to 28 U.S.C. § 1441, this action can be removed to federal court.
8. A copy of the Notice of Filing of Notice of Removal, which is attached as Exhibit C, will be provided to Plaintiff and the Clerk of the Superior Court of Richmond County as required by 28 U.S.C. § 1446(b).

Wherefore, Defendants move that this action be removed to this Court and that no further proceedings be had in the Superior Court of Richmond County.

Respectfully submitted this 4th day of January, 2023.

/s/Tameka Haynes
Tameka Haynes
Georgia Bar No. 453026
Randolph Frails
Georgia Bar No. 272729

Attorneys for Defendants

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CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the foregoing **Notice of Removal** in accordance with ECF rules by electronically filing a copy with the Clerk of Court using the CM/ECF system, via email, or via the United States Mail with adequate postage attached thereon to:

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This 4th day of January, 2023.

/s/Tameka Haynes
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Georgia Bar No. 453026
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